

**Federal Defenders
OF NEW YORK, INC.**

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June 8, 2021

BY EMAIL TO CHAMBERS
EX PARTE & REQUEST TO FILE UNDER SEAL

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

RE: United States v. Michael Avenatti
19 Cr. 374 (JMF)

Dear Judge Furman:

Michael Avenatti's next financial update is not due to the Court until July 5, 2021 and his financial position has not materially changed since the Court appointed the Federal Defenders to represent Mr. Avenatti in this case. However, in an abundance of caution, we wish to bring the following to the Court's attention. A non-family-member acquaintance of Mr. Avenatti recently paid legal fees directly to [REDACTED] a New York-based attorney who is assisting Mr. Avenatti in the Nike-related matter pending before Judge Paul G. Gardephe (19 Cr. 373 (PGG)). None of these monies ever belonged to Mr. Avenatti and the payment was a purely gratuitous payment unrelated to this case.

Should the Court have any questions, please do not hesitate to contact us. Because Mr. Avenatti's underlying CJA 23 Form and accompanying affidavit remain under seal, and for the reasons set forth in our motion to keep Mr. Avenatti's sworn statements about his finances sealed, we respectfully submit this letter ex parte and request leave to file it under seal.

Respectfully Submitted,

/s/
Robert M. Baum, Esq.
Tamara Giwa, Esq.
Andrew J. Dalack, Esq.

Counsel for Michael Avenatti